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U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 28, 2021

**MEMO ENDORSED**

VIA ECF

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Lin, et al. v. Mayorkas, et al.*, No. 21 Civ. 2010 (VEC)**

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate their Applications to Register Permanent Residence or to Adjust Status (Forms I-485). The Court has scheduled an initial conference in this case for May 14, 2021, and pre-conference submissions are due on May 6, 2021. On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days to respond to the complaint (*i.e.*, from May 10, 2021 to July 9, 2021). I also respectfully request that the initial conference be adjourned to July 23, 2021, or thereafter.

The extension is respectfully requested because the necessary files are in transit to the USCIS field office in charge of the adjudication of the Forms I-485. Once the files are received, USCIS will determine next steps, which may include the issuance of Requests for Evidence, interviews, or other action. The government anticipates that the requested extension will provide adequate time for USCIS to determine what next steps may be necessary with respect to the Forms I-485 or to proceed to take adjudicative action, which potentially would render this action moot. This is the government’s first request for an extension of the deadline to respond to the complaint and to adjourn the initial conference. Plaintiffs’ counsel consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

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cc: Counsel of record (via ECF)

Application GRANTED.

Defendant's time to answer, move, or otherwise respond to the Complaint is adjourned to **Friday, July 9, 2021**.

The initial pretrial conference, currently scheduled for May 14, 2021, at 2:00 P.M., is adjourned to **Friday, July 23, 2021 at 9:30 A.M.** Pre-conference submissions are due no later than **Thursday, July 15, 2021**. For the conference dial in information and a description of the requirements of the pre-conference submissions, the parties should consult the Court's March 11, 2021 Order at docket entry 7.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

Date: April 29, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE